

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SMITH KLINE & FRENCH)
LABORATORIES LIMITED and)
SMITHKLINE BEECHAM)
CORPORATION d/b/a)
GLAXOSMITHKLINE,)
)
Plaintiffs,)
v.)
TEVA PHARMACEUTICALS USA, INC.,)
)
Defendant.)

Civil Action No. 05-197-GMS

PUBLIC VERSION

**PLAINTIFFS' DEPOSITION COMPLETENESS DESIGNATIONS, OBJECTIONS TO
TESTIMONY DESIGNATED BY DEFENDANT AND COUNTER-DESIGNATIONS**

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Dated: February 7, 2007

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AND COUNTERDESIGNATIONS FOR DEPOSITION TESTIMONY**

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**GSK'S DEPOSITION COMPLETENESS DESIGNATIONS & OBJECTIONS
FOR BRENDA COSTALL**

TEVA DESIGNATION	GSK COMPLETENESS DESIGNATION	GSK OBJECTION(S)
5:15-6:2		Relevance
7:1-7:7		Relevance
9:4-9:13		Relevance
10:22-11:3		Relevance
22:15-23:1	23:2-23:5	
31:21-32:12	23: 9 to 24:10	Vague
32:15-33:6	32:13-14	
75:4-75:7	75: 8 - 76:22, 77:10-79:2	Expert, relevance, foundation
77:1-77:9	75: 8 - 76:22, 77:10-79:2	Expert, relevance, foundation, calls for a legal conclusion
102:12-103:2	103: 3-12	Relevance, hearsay
123:10-123:17	123:2-123:9	Relevance
124:15-124:20		Vague
128:1-128:18		Relevance, speculation, best evidence
132:2-132:17		
141:1-141:5		Relevance, expert, speculation
141:8-141:9	141: 6-7	Relevance, expert, speculation, compound, vague
150:6-150:16		
152:22-153:4	157: 1-15	Foundation, vague
159:14-162:7	319: 6-22 to 320: 1-2; Errata 160:2 ,161:9	Relevance, expert, speculation, form
162:9-162:18	162: 8, 19-20	Expert, relevance, incomplete hypothetical
162:21-163:12	163:13	Expert, relevance, incomplete hypothetical
163:14-163:17	163:13	Expert, relevance, incomplete hypothetical
164: 12-164:21		Expert, relevance
165: 1-165:17		Expert, relevance
194:4-195:4		Hearsay, relevance
203:8-203:15		
207:5-207:11		
208:9-208:19		Speculation
212:13-215:6		Speculative, expert, form, foundation
221:22-222:16		

224:10-225:6		speculation
258:22-259:4	259: 5	Form, foundation, hearsay
259:6-259:8	259:9	Foundation, hearsay
259:10-259:12		Foundation
272:10-272:11		Relevance
272:14-273:8		Hearsay, relevance
274:12-274:14	274: 15-18	
274:19		
274:21-276:10	276:11-17	Hearsay, foundation
287:15-288:5	319: 6-22 to 320: 1-2	Expert, expert, vague,
290:7-290:13	319: 6-22 to 320: 1-2	Expert, hearsay, relevance
291:10-291:14	291: 15	Expert, foundation, form, relevance
291:16-291:21		Expert, foundation, relevance
300:14-300:22		Relevance

**GSK'S DEPOSITION COUNTER DESIGNATIONS
FOR BRENDA COSTALL**

GSK incorporates all of its affirmative designations for this witness listed in Exhibit 16 of the Proposed Pretrial Order, filed on November 3, 2006, to be designated as counter designations. In addition, GSK designates the following deposition testimony as counter to Teva's deposition designations:

76:6-7

282: 2-8

283:10-12

312:18 - 314: 4

319: 6- 320:2

**GSK'S DEPOSITION COMPLETENESS DESIGNATIONS
& OBJECTIONS FOR ROGER EDEN**

TEVA DESIGNATION	GSK COMPLETENESS DESIGNATION	GSK OBJECTION(S)
6:16-6:19	6:20-21	
9:5-9:14	9:14-16 33:6-34:1	Relevance
27:14-28:1		
40:8-40:19	40:5-7	
40:20-41:10	41: 11-15	
41:16-42:19	42: 20-22	
59:6-60:1	60:2-17	Relevance, foundation, hearsay
60:18-62:8	60:2-17, 62: 9-14	Relevance, foundation, hearsay
63:1-63:7		
63:8-63:18	61:22-62:14	Hearsay
63:19-64:11	64: 12-15	
64: 16- 65:9	64: 12-15	
66:2-66:10	65: 20-66:1	
72:4-72:19		
80:7-80:10	80: 11	Hearsay, foundation
80:12	80: 11	Hearsay, foundation
80:13-80:19		Speculation, Hearsay
88:1-88:6	88: 7	Foundation, speculation
88:8-88:12	88: 7	Hearsay, foundation, relevance
89:16-90:11		Foundation, relevance, expert
92:19-93:10	91: 18-92 :18	Relevance, hearsay
94:14-94:20	94: 4-13	Foundation, relevance
98:18-98:21		Relevance
100:2- 100:16	100:17-22 to 101:1	Best evidence, hearsay, foundation
107:20 -108:2	108: 3	Foundation, hearsay, best evidence, relevance, speculation
108:4 - 108:9	108: 3; 108:10-14	Foundation
110:22-112:2	112: 3-10	Best evidence, hearsay, foundation, relevance, compound
148:2-148:3	148: 4-8	Relevance
148:9-148:22	148: 4-8	Relevance

154:1-154:5		Relevance
154:11-154:15	154: 16-17	Relevance
154: 18-155:2	154: 16-17	Relevance
163:1-163:4		Vague
164:6-164:8	164:9-11	Vague
164:12-164:14	164: 9-11, 164: 15-17	Vague
165:4-165:9	164: 21-165: 3	Relevance
165:12-165:13		Relevance
166:8-166:14	166: 15- 167:10	Relevance, foundation
183:15-184:6	184: 22- 185: 5	Relevance, foundation, vague
208:5-208: 13	185: 15-186:12, 207:16-208:4	Best evidence, relevance, expert, vague
209: 1- 209:3	209: 4-5	Foundation, relevance, speculation
209:6	209: 4-5	Foundation, relevance, speculation
218:3-218:14	218: 15-16	Relevance, speculation, foundation
218: 17-219:2	218: 15-16	Relevance, speculation
220: 15-221: 14	221: 15; 91:18-92:7	Best evidence, foundation, speculation, hearsay, asked and answered
221:16-221:19	221: 15, 20; 91:18-92:7	Best evidence, foundation, speculation, hearsay, asked and answered
221: 21	221: 20 91:18-92:7	Best evidence, foundation, speculation, hearsay, asked and answered
229:11-229:13	229: 14-16;	Hearsay, relevance, foundation, expert
229:17-229:19	229:14-16; 229: 20-231:13	Hearsay, expert, foundation, relevance
242:3-243:6	243: 7, 9-20	Best evidence, foundation, speculation, hearsay
243:8	243: 7, 9-20	Best evidence, foundation, speculation, hearsay
246: 22 - 247: 3	132: 3-19; 133:13-134:1; 247: 4-15, 21	Expert, incomplete hypothetical, calls for

		speculation, foundation
247: 16- 247:20	247: 21	Expert, incomplete hypothetical, calls for speculation, foundation
247: 22 - 248:1	247: 21	Expert, incomplete hypothetical, calls for speculation, foundation
248:16-248:17	248: 21-22;	Relevance, foundation
249:16 - 250:20	250: 21-251: 8	Relevance, best evidence, hearsay, expert, foundation
251: 9 -251: 19	251: 20-21	Relevance, expert
251: 22- 252: 11	251: 20-21, 252: 12, 16, 19-22	Relevance, expert, foundation
252: 13-252:15	252: 12, 16, 19-22	Relevance, expert
252:17-252:18	252: 16, 19-22	Relevance, expert
253:1-253:16	252: 19-22	Relevance, expert, foundation
253: 19-254:1	252: 19-22; 253: 17-18; 254: 2	Relevance, expert, foundation, form
254:3-254:13	252: 19-22; 254: 2; 254: 14-15	Relevance, expert, foundation
254:16-255:5	252: 19-22; 254: 14-15; 255: 6-15	Relevance, speculation

**GSK'S DEPOSITION COUNTER DESIGNATIONS
FOR ROGER EDEN**

GSK incorporates all of its affirmative designations for this witness listed in Exhibit 16 of the Proposed Pretrial Order, filed on November 3, 2006, to be designated as counter designations. In addition, GSK designates the following deposition testimony as counter to Teva's deposition designations:

184: 15-185:5

208: 14-22

**GSK'S DEPOSITION COMPLETENESS DESIGNATIONS & OBJECTIONS
FOR GREGORY GALLAGHER**

TEVA DESIGNATION	GSK'S COMPLETENESS DESIGNATION	GSK OBJECTION(S)
5:16-5:21	5:22-6:11	Privilege; Relevance
10:2-10:10	10:11-14	
10:15-11:8	11:9-11:19	Relevance
12:17-14:19	14:20-17:5	Relevance
17:6-17:21	14:22-17:5, 17:22-18:19, errata 18:10	
44:12-44:19	45:1-45:3	Authentication; Best evidence
182:1-183:3		
216:15-218:3	218:4-219:7	Relevance
221:3-222:13		Relevance
222:15-222:17	222:14	Speculation
222:19-223:10		Speculation; Relevance
223:12-223:15	223:11	Speculation; Relevance
223:17	223:16, 223:19-225:20	Speculation; Relevance
227:9-228:3		Speculation; Relevance; Vague
228:5	228:4	Speculation; Relevance; Vague
228:7-228:11		Speculation; Relevance; Vague
228:13	228:12	Speculation; Relevance; Vague
228:15-229:6		Speculation; Relevance; Vague
229:8	229:7	Speculation; Relevance; Vague
230:5-231:20		Speculation; Relevance; Vague
236:13-237:12		Speculation; Relevance; Vague
237:15-237:19	237:13	Speculation; Relevance; Vague
248:12-248:15	248:16-248:21	Relevance
248:22-249:12	249:13-15	Relevance; Hearsay
249:18-252:18		Relevance; Speculation

**GSK'S DEPOSITION COUNTER DESIGNATIONS
FOR GREGORY GALLAGHER**

GSK incorporates all of its affirmative designations for this witness listed in Exhibit 16 of the Proposed Pretrial Order, filed on November 3, 2006, to be designated as counter designations. In addition, GSK designates the following deposition testimony as counter to Teva's deposition designations:

31:19-32:3
115:3-115:16
116:6-116:15
120:14-121:4
223:19-225:20

**GSK'S DEPOSITION COMPLETENESS DESIGNATIONS & OBJECTIONS
FOR PETER GIDDINGS**

TEVA DESIGNATION	GSK COMPLETENESS DESIGNATION	GSK OBJECTION(S)
54:4-55:7		Speculation; Relevance; Privilege; Foundation
55:9-56:1	55:8	Speculation; Relevance; Privilege; Foundation
56:5-57:14		Speculation; Relevance; Privilege; Foundation
57:16-59:4	57:15	Speculation; Relevance; Privilege; Foundation; Form
59:10-60:13	59:5	Speculation; Relevance; Privilege; Foundation
132:8-135:17		Relevance
135:20-136:22	135:18-19	Document speaks for itself; Relevance
137:3-138:7	137:1-137:2	Document speaks for itself; Mischaracterization; Relevance
138:9-138:16	138:8, errata 138:12	Document speaks for itself; Mischaracterization; Relevance
138:19-138:19	138:17	
138:21-139:8	138:20	Document speaks for itself; Relevance; Speculation
139:11-140:16	139:9-10	Speculation; Foundation; Relevance; Mischaracterization; Document speaks for itself
140:19-141:21	139:9-10	Speculation; Relevance; Document speaks for itself
142:1-142:4	141:22	Speculation; Relevance; Document speaks for itself
142:8-142:14		Speculation; Relevance
142:16-143:3	142:15	Speculation; Foundation; Relevance
143:5-143:6	143:4; 143:7-144:10	Speculation; Foundation; Relevance
144:11-145:6	143:7-144:10	Speculation; Foundation; Relevance
145:8-145:14	145:7	Speculation; Foundation; Relevance
145:16-146:12	145:15	Speculation; Foundation; Relevance

TEVA DESIGNATION	GSK COMPLETENESS DESIGNATION	GSK OBJECTION(S)
146:14-149:14	146:13	Speculation; Foundation; Relevance; Form; Document speaks for itself
149:17-149:17		
149:20-149:21	149:18-19	Speculation; Relevance; Form; Document speaks for itself
202:10-208:3		Speculation; Relevance; Privilege; Foundation; Hearsay

**GSK'S DEPOSITION COUNTER DESIGNATIONS
FOR PETER GIDDINGS**

GSK incorporates all of its affirmative designations for this witness listed in Exhibit 16 of the Proposed Pretrial Order, filed on November 3, 2006, to be designated as counter designations. In addition, GSK designates the following deposition testimony as counter to Teva's deposition designations:

29:9-30:11

47:1-14

143:7-144:10

**GSK'S DEPOSITION COMPLETENESS DESIGNATIONS & OBJECTIONS
FOR CAROL HARVEY**

TEVA DESIGNATION	GSK COMPLETENESS DESIGNATION	GSK OBJECTION(S)
8:20-9:3		
9:18-9:20	9: 14-17; 9:21-10:10	
16:12-17:6		
21:3-21:6		Relevance
42:2-42:11		
48:4-48:6	47: 22-48:3; 48: 7-12; 48: 16-20	Relevance, foundation, hearsay, privilege
48:13-15	47: 22-48:1; 48: 7-12; 48: 16-20	Relevance, foundation, hearsay, privilege
48:21-49:22	47: 22-48:1; 48: 7-12; 48: 16-20	Relevance, foundation, hearsay, privilege
81:5-81:22	61:14-63:2; 64:4-65:4; 66:5-15; 67:1-69:8; 71:16-72:3; 80: 14-17; 82: 1-20	Relevance, speculation, foundation, hearsay, expert, calls for legal conclusion
141:10-142:11	142:12-20	Relevance
144:12-145:3	145: 4-22 to 146: 1	Relevance
146: 2-146:20	146: 21-22 to 147: 1-19	Relevance, speculation
147:20-148:8	146: 21-147: 19	Relevance, speculation, foundation
149:11-149:16		Relevance
150:16-151:17	151: 18-152: 1	Relevance, foundation,
152: 2-152:7		Relevance
169:10-169:16		Relevance
177:10-177:17	176: 2-177:9	Relevance, speculation, foundation
185: 1-185: 6		Relevance, foundation, speculation
185:18-21		Relevance, foundation,

		speculation
187:18-187:22	185: 22-186: 12; 187: 8-17, 188: 1-2	Relevance, foundation, speculation
188:3-189:11	187: 13-18; 188: 1-2, 12	Relevance, foundation, speculation, expert, vague
194: 2-194:12	194:13-19	Speculation, foundation, relevance
194:20-195:19	194:13-19; 195:20-196: 7	Speculation, foundation, relevance
196:10-196:16		Foundation, hearsay, relevance, speculation
202:4-203:16	71: 16-72:3	Speculation, relevance, foundation,
208: 12-208:18		Relevance
212:5-212:21		Relevance, foundation
213: 9-213:13	213: 4-8	Vague, foundation, relevance
241:6-241:22		Relevance
250:2-251:11	251:12-253:16	Relevance, foundation, speculation, expert
261:7-261:9		Relevance
261:16-262:1	261: 10-15; 262: 2-9	Relevance
263:12-264:7	265: 7-16	Relevance, speculation, document speaks for itself

GSK'S DEPOSITION COUNTER DESIGNATIONS FOR CAROL HARVEY

GSK incorporates all of its affirmative designations for this witness listed in Exhibit 16 of the Proposed Pretrial Order, filed on November 3, 2006, to be designated as counter designations. In addition, GSK designates the following deposition testimony as counter to Teva's deposition designations:

36: 17-22

37:1-3

37: 15-38:6

176: 2-177:9

**GSK'S DEPOSITION COMPLETENESS DESIGNATION & OBJECTIONS
FOR PAUL HIEBLE**

TEVA DESIGNATION	GSK COMPLETENESS DESIGNATION	GSK OBJECTION(S)
5:15-20		
6:6-9		
8:7-8:20		Vague
92:17-19	92:20	Confusing; ambiguous; relevance
92:21		
107:11-108:1	19:19-20:4; 69:1-22; 71:13-19; 108:5-8	Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
108:5-8	59:5-9	Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
108:13-16		Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
110:6-17	110:18	Calls for legal conclusion Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
110:19		Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
115:2-116:2	116:3	Vague; speculation Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
116:4-8		Speculation Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation

116:10-118:8	118:9	Calls for expert testimony; speculation Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
118:10-11		Speculation Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
118:13	118:14	Speculation; calls for expert testimony Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
118:15		Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
118:17-120:5		Best evidence (document speaks for itself) Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
120:7-10	120:11	Confusing; argumentative Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
120:12-14		Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
120:16-17	120:18	Calls for speculation, expert testimony Objections to Exhibit 29 (DTX 29): authenticity;

		lack of foundation; calls for speculation
120:19	120:12-14	Speculation Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
123:2-14		Assumes a fact not in evidence; confusing
123:16-19		
126:19-20	126:21	Assumes a fact not in evidence
126:22-128:6		
135:3-135:17	135:18	Relevance; speculation; calls for expert testimony
135:19-20		
135:22-136:7		Calls for expert testimony; speculation
136:9-10	136:11	Speculation; expert testimony; relevance
136:12-13		
136:15-137:2	137:3	Speculation; relevance
137:4-7		
137:9-13	137:14	Speculation
137:15-17		
137:19	137:20	Speculation
137:21		
138:1-4		
138:6-11		Calls for expert testimony; speculation
138:13	138:14	Calls for expert testimony; speculation
138:15-17		
140:22-141:8	141:9	Counsel testifying; assumes a fact not in evidence; calls for expert testimony; speculation
141:10		Speculation; expert testimony
141:12-13	141:14	Expert testimony; vague
141:15		
141:17	141:18	Expert testimony
141:19-22		
142:2	142:3	Expert testimony;

		speculation
142:4		
142:6	142:7	Vague
142:8		
142:10-17	142:18	Mischaracterizes testimony
142:19-22		
143:2-3	143:4; 65:12-16; 65:17-66:10	Speculation
143:5		
144:18-145:3	145:4	Calls for expert testimony, speculation
145:5-6		
145:8-10	145:11	Calls for expert testimony; speculation
145:12-13		
145:15-146:6	146:7	Calls for expert testimony
146:8-11		
146:13-17	146:18	Assumes a fact not in evidence; confusing
146:19-20		
146:22-147:2	147:3	Assumes a fact not in evidence
147:5-6	147:7	Asked and answered
147:8-9		
147:11	147:12	Calls for speculation
147:13		
152:11-153:1		
154:13-14		
154:21-155:9	155:10;	Best evidence; lack of foundation
155:11-12		
155:14-16	155:17	Calls for speculation
155:18-22		Calls for speculation
156:2-6	156:7; 163:8-11	Lack of foundation
156:8		
156:10-22	157:1	Calls for speculation
157:2-3		
157:5-19	157:20	Incomplete question
157:21		
158:1-22	159:1	Asked and answered; calls for speculation
159:2-3		
160:12-17	160:18 133:5-10	Calls for expert testimony; speculation
160:19-20		

160:22-161:1	161:2	Calls for expert testimony; speculation
161:3-8	133:5-10	
161:10-15	161:16; 57:2-4; 133:5-10	Calls for expert testimony
161:17-19		
161:21-162:1	162:2	Calls for expert testimony
162:3-4		
162:6-7	162:8	Calls for expert testimony
162:9		
163:17-19	163:20	Calls for expert testimony
163:21-22		
166:18-167:8	167:9; 57:2-4; 133:5-10	
167:10-15		
168:9-12	168:13	Incomplete hypothetical; calls for expert testimony
168:14-15		
168:17-168:22	44:6-20; 43:17-29	Calls for expert testimony; vague
176:12-17	176:18	Confusing; lack of foundation
176:19-20		
177:20-22	178:1	Confusing; mischaracterizes testimony
178:2		
178:4-12	179:1; 104:5-105:3	Attorney-client
190:4-16	190:17	Speculation; confusing
190:18-19		
190:21-191:3	191:4	Speculation; confusing; compound sentence
191:5		
200:5-12	200:13	Best evidence
200:14		

200:16-201:5	201:6	Assumes a fact not in evidence
201:7		
201:9-10	201:11	Vague; calls for legal conclusion
201:12		
201:14-18	201:19	Vague; calls for legal conclusion
201:20-21		
214:6-13	214:14	Assumes a fact not in evidence; confusing
214:15		
225:1-3	225:4-5	Confusing; calls for a legal conclusion
225:7-226:16		Calls for speculation; relevance; counsel testifying; mischaracterizes

**GSK'S DEPOSITION COUNTER DESIGNATIONS
FOR PAUL HIEBLE**

GSK incorporates all of its affirmative designations for this witness listed in Exhibit 16 of the Proposed Pretrial Order, filed on November 3, 2006, to be designated as counter designations. In addition, GSK designates the following deposition testimony as counter to Teva's deposition designations:

10:16-18
18:8-12
21:5-6
21:21-22:9
23:2-5
29:1-29:8
43:17-19
44:6-20
45:9-15
57:2-4
74:5-19
74:17-19
84:17-85:6
120:12-14
126:22-127:4
133:5-10
169:1-5
203:4-21
204:18-21
206:21-207:5

**GSK'S DEPOSITION COMPLETENESS DESIGNATIONS
& OBJECTIONS FOR WILLIAM HUFFMAN**

TEVA DESIGNATION	GSK COMPLETENESS DESIGNATION	GSK OBJECTION(S)
170:8-170:5		
174:17-174:21		

**GSK'S DEPOSITION COUNTER DESIGNATIONS
FOR WILLIAM HUFFMAN**

GSK incorporates all of its affirmative designations for this witness listed in Exhibit 16 of the Proposed Pretrial Order, filed on November 3, 2006, to be designated as counter designations.

**GSK'S DEPOSITION COMPLETENESS DESIGNATIONS & OBJECTIONS
FOR DAVID OWEN**

TEVA DESIGNATIONS	GSK COMPLETENESS DESIGNATIONS	GSK OBJECTION
5:13-5:14		
6:8-6:18		
7:1-7:5		
7:14-8:12		
17:10-18:4	18:5-15	
20:12-20:17	20:18-20:20	Relevance; vague
20:21-20:22		Relevance
25:21-26:5		
26:19-29:8	29:9	Lack of foundation, calls for speculation; attorney-client
29:10-29:11		
30:5-30:21		Mischaracterizes testimony; assumes facts not in evidence; confusing
31:14-32:10	32:11-33:3	Attorney-client
33:4-33:10		Attorney client
40:6-40:21	40:22	Assumes facts not in evidence.
41:1-3		
42:19-43:2	39:10-40:5	
50:3-51:8	51:9	Vague; ambiguous
54:7-55:8	72:3-73:4; 60:6-13; 52:2-11	Assumes a fact not in evidence; Confusing
65:2-65:6	65:12-22	
70:15-72:6	72:7; 66:1-4	
72:8-74:4	74:5	Lack of foundation
74:6-19		Speculation
75:3-75:17		Attorney-client; misstates prior testimony
81:10-85:5		Attorney-client; calls for legal conclusion
85:19-85:22	131:5-12	
88:14-89:15		Lacks foundation (specification not before witness)

90:16-91:18		Confusing; calls for legal conclusion
93:3-93:21	94:19-95:7	Attorney-client; work product
99:5-99:10	99:11	Confusing; calls for expert testimony
99:12-100:9		
101:8-104:4	104:5-104:11	
104:12-108:17	108:18	Mischaracterizes testimony
108:19-109:2		
110:10-111:3	66:1-4	
114:21-115:15		Mischaracterizes testimony; attorney testimony
117:7-118:19	118:20-119:18; 152:6-18	
119:19-121:7	121:8-12	Attorney client
121:13-121:16		
124:7-125:5	125:6-8;	Speculation, assumes facts not in evidence, incomplete question
125:9-125:20	25:21; 126:3-8	Speculation
125:22-126:2	41:1-3	
126:9-127:13	127:14-15; 77:11-78:2	Narrative—question is too broad; calls for expert testimony Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
127:16-127:17		
129:16-130:2	130:3	Calls for expert testimony Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
130:4-130:16	130:17	Lack of foundation; calls for speculation, expert testimony
130:18-132:3	132:4	Lack of foundation, calls for speculation; calls for expert testimony; calls for legal conclusion
132:5-21	132:22	Calls for speculation;

		expert witness testimony
133:1-10	133:11-12	Asked and answered; calls for speculation
133:13-14		Confusing; calls for speculation; lack of foundation; calls for expert testimony
134:1-140:7		Confusing; calls for speculation; lack of foundation; calls for expert testimony Objections to Exhibit 29 (DTX 29): authenticity; lack of foundation; calls for speculation
141:1-141:13		
152:6-153:7		
156:14-157:2		
157:3-157:20	158:10-12	
161:1-161:21	159:9-13	Mischaracterizes testimony; asked and answered
163:4-164:18	166:9-15; 164:19-165:19; 169:9-21	Calls for speculation
166:16-168:13	168:14; 153:8-12; 171:17-172:5	Confusing; calls for speculation; calls for expert testimony Objections to Exhibit 35 (DTX 35): authenticity; lack of foundation; speculation
168:15-170:1	170:2	Objections to Exhibit 35 (DTX 35): authenticity; lack of foundation; speculation
170:3-170:18	170:19	Objections to Exhibit 35 (DTX 35): authenticity; lack of foundation; speculation
170:20-171:3		Objections to Exhibit 35 (DTX 35): authenticity; lack of foundation; speculation
174:1-7	174:8-175:12	Objections to Exhibit 35 (DTX 35): authenticity; lack of foundation; speculation

181:16-181:19	181:20-182:6	
182:7-184:11	184:12-13	Lack of foundation, calls for expert testimony; speculation; confusing
184:14-185:5	185:6-7	Lack of foundation, speculation; calls for expert testimony; confusing; asked and answered
185:8-185:12	185:13	Mischaracterizes testimony
185:14-185:20	185:21	Calls for legal conclusion, speculation
185:22-186:3		Speculation
186:22-188:13	188:14; 188:22-189:5	Confusing
188:15		
189:17-190:8	190: 9-16	
190:17-191:9	191:10	Lack of foundation, calls for speculation, calls for expert testimony; mischaracterizes testimony
191:11-191:17	191:18	Speculation; calls for expert testimony; lack of foundation
191:19-192:17	192:18	Speculation; lack of foundation; calls for expert testimony
192:19-193:3		Speculation; calls for expert testimony; lack of foundation
202:10-203:5	203:6-21	Attorney-client
204:2-204:10	204:11-12; 203:6-21	Attorney-client; calls for speculation; mischaracterizes testimony
204:13-204:16	204:17	Vague.
204:18-205:1	208:4-21	Calls for speculation
205:22-206:13	208:4-21; 206:14-17	Attorney-client
206:18-207:1	207:2-3	Attorney-client
207:4		
209:3-209:22	210:1	Relevance; calls for speculation; calls for legal conclusion; calls for expert testimony
210:2-210:5	210:6-211:8; 214:22-215:15	Relevance
211:9-211:15	211:16	Relevance; calls for speculation; calls for legal conclusion; calls for expert testimony
211:17-211:21		Relevance
216:3-216:13	216:14	Confusing

216:15-217:7	217:8; 231:17-22	Confusing
217:9-217:11	217:12	Calls for legal conclusion; mischaracterizes testimony
217:13-217:18	217:19	Calls for legal conclusion; mischaracterizes testimony
217:20-221:15	222:13-21; 226:13-18	Calls for speculation Objections to Exhibit 35 (DTX 35): authenticity; lack of foundation; speculation
229:14-230:5	230:6; 230:11-18; 109:3-14; 178:5-21	Compound question; calls for expert testimony, calls for speculation
230:7-230:18		
231:9-231:22	255:1-4	Relevance
244:20-246:3		
246:10-246:15		Relevance; legal conclusion

GSK'S DEPOSITION COUNTER DESIGNATIONS FOR DAVID OWEN

GSK incorporates all of its affirmative designations for this witness listed in Exhibit 16 of the Proposed Pretrial Order, filed on November 3, 2006, to be designated as counter designations. In addition, GSK designates the following deposition testimony as counter to Teva's deposition designations:

31:5-31:13
40:13-41:3
52:2-11
59:8-22
59:6-60:13
60:6-13
65:12-22
66:1-66:4
66:5-67:21
72:3-13
72:3-73:4
80:14-81:9
80:21-81:9
91:19-92:7
94:19-95:7
95:12-96:1
96:17-97:20
104:18-106:1
109:3-14
118:15-119:18
118:20-119:18
119: 10-18
121:17-122:11
122:12-22
126:3-8
129:9-15
131:5-7
141:5-7
142:1-5
152:6-18
153:8-12
159:9-13
164:19-165:19
166:9-15
169:9-21
171:17-172:5

175:17-176:11
177:2-14
178:5-21
193:19-194:6
200:16-19
201:10-22
203:6-21
206:14-17
208:4-21
210:6-211:8
214:22-215:7
230:11-18
238:14-239:3
240: 5-15
240:11-15
255:1-4

**GSK'S DEPOSITION COMPLETENESS DESIGNATIONS & OBJECTIONS
FOR KEVIN REEVES**

TEVA DESIGNATION	GSK'S COMPLETENESS DESIGNATION	GSK OBJECTION(S)
7:12-7:14		
8:7-9		
18:10-19:6		Relevance; Not designated in accordance with pre-trial order deadlines; designated for the first time in January 2007.
20:1-5	20:6-12	Relevance; Not designated in accordance with pre-trial order deadlines; designated for the first time in January 2007.
20:13-22:14	19:7-9 20:6-12	Relevance; Not designated in accordance with pre-trial order deadlines; designated for the first time in January 2007.
29:6-14		Not designated in accordance with pre-trial order deadlines; designated for the first time in January 2007.
31:22-32:2; 32:3-32:11	32:12-22; 271:22-272:21; 274:10-275:19	Incomplete; calls for a legal conclusion; relevance; Lines 31:22-32:2 not designated in accordance with pre-trial order deadlines; designated for the first time in January 2007.
33:2-13	33:14-19	Incomplete; best evidence; relevance
33:20-22	33:14-19	Incomplete; best evidence; relevance
37:16-21	37:3-11	
51:14-52:10		Vague;
62:7-62:8	62:9	Vague, incomplete
62:10-11	62:9	Vague, incomplete
62:13-14	62:15	Vague, incomplete
62:16	62:15	Vague, incomplete
66:14-16	66:17	Vague, incomplete, relevance
66:18-20	66:17	Vague, incomplete, relevance
66:22	67:2	Vague, incomplete,
67:3-4	67:2	See above
67:22-68:2	68:3	Vague, incomplete, not designated in accordance with pre-trial order deadlines; designated for the first time in

		January 2007.
68:12-17		Vague, incomplete, relevance, not designated in accordance with pre-trial order deadlines; designated for the first time in January 2007.
69:12-17		Relevance
71:1-3	71:4	Compound, vague, incomplete
71:5	71:4	See above
71:11-15	71:16	Compound, vague, relevance
71:17-19	71:16	See above
71:21-72:18		Relevance; beyond scope
74:3-6	74:7	Relevance, vague, incomplete
74:8-9	74:7	See above
74:11-13	74:7	See above
74:14-16	74:18-75:3	Relevance, vague, incomplete
75:10-76:5	76:6	Relevance; Incomplete; not designated in accordance with pre-trial order deadlines; designated for the first time in January 2007.
76:7	76:6	Relevance; Incomplete; not designated in accordance with pre-trial order deadlines; designated for the first time in January 2007.
79:6-9	79:10-82:5; 84:1-88:1	Relevance, incomplete
82:6	82:7-18	Relevance, incomplete, vague; not an expert
82:19-83:5	82:7-18	See above
120:17-121:7	121:8-124:6	
122:1-5	122:6-18	Relevance, foundation, incomplete, not designated in accordance with pre-trial order deadlines; designated for the first time in January 2007.
122:19-123:11	122:6-18	Relevance, foundation, vague
136:13-137:10	137:11-19; 122:6-18	Relevance, foundation
137:20-22	138:1-3; 138:9-12; 137:11-19; 122:6-18	Vague, foundation, expert testimony, incomplete
138:4-8	138:1-3; 138:9-12; 137:11-19; 122:6-18	See above
143:3-17	144:16-145:1	
145:3-146:17		Relevance; 145:17-146:3 not designated in accordance with pre-trial order deadlines; designated for the first time in

		January 2007.
147:19-22	148:1; 148:14-149:11	Relevance, vague, incomplete
148:2-4	148:1; 148:14-149:11	See above
148:6-13	148:1; 148:14-149:11	See above
149:12-153:12		Relevance; compound; foundation; vague; Incomplete; 149:12-150:8, 151:12-152:1 not designated in accordance with pre-trial order deadlines; designated for the first time in January 2007.
201:2-4	201:5-6	Expert, relevance
201:7-12	201:5-6	See above
201:14-17	201:5-6	See above
201:18-203:13	201:5-6; 203:14-205:8	See above
205:10-22		Relevance; not designated in accordance with pre-trial order deadlines; designated for the first time in January 2007.
233:10-14		
234:4-6	233:10-246:12	
234:16-17		
235:1		
236:12-237:10		
238:8-239:10		Relevance; not designated in accordance with pre-trial order deadlines; designated for the first time in January 2007.
241:19-242:18		Relevance; not designated in accordance with pre-trial order deadlines; designated for the first time in January 2007.
244:10-18		Relevance; not designated in accordance with pre-trial order deadlines; designated for the first time in January 2007.
266:19-22	267:1-2	Document speaks for itself; expert testimony; foundation; relevance
267:3-4	267:1-2	See above

**GSK'S DEPOSITION COUNTER DESIGNATIONS
FOR KEVIN REEVES**

GSK incorporates all of its affirmative designations for this witness listed in Exhibit 16 of the Proposed Pretrial Order, filed on November 3, 2006, to be designated as counter designations.

CERTIFICATE OF SERVICE

I, Patricia Smink Rogowski, hereby certify that on February 15, 2007 [PUBLIC VERSION] PLAINTIFFS' DEPOSITION COMPLETENESS DESIGNATIONS, OBJECTIONS TO TESTIMONY DESIGNATED BY DEFENDANT AND COUNTER-DESIGNATIONS was filed with the Court Clerk using CM/ECF which will send notification of such filing(s) to Josy W. Ingersoll.

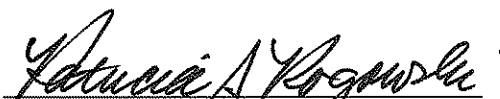
I hereby further certify that on February 15, 2007, I have also served this document on the attorneys of record at the following addresses as indicated:

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